

REMARKS

This Supplemental Amendment further addresses certain issues raised in the Office Action mailed December 10, 2004 (the "Action") and supplements the Amendment filed March 9, 2005. In particular, Claim 101 has been added. Claim 101 includes the recitations of Claims 74-76 and 78-79 rewritten in independent form, and therefore, presents no new matter.

Applicants hereby incorporate the arguments presented in the Amendment filed March 9, 2005. In addition, Applicants request consideration of the recitations of new Claim 101 and submit that Claim 101 is patentable for at least the reasons that will now be explained. Accordingly, the Applicants request that this Supplemental Amendment be considered together with the Amendment filed March 9, 2005.

As noted above, new Claim 101 includes the recitations of Claims 74-76 and 78-79. Claims 74-76 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,751,220 to Hu ("Hu"), Claim 78 stands rejected under 35 U.S.C. § 103(a) as being obvious over Hu, and Claim 79 stands rejected under 35 U.S.C. § 103(a) as being obvious over Hu in view of U.S. Publication No. 2002/0013832.

Specifically, Claim 101 recites as follows:

A method of creating a link to an object, the method comprising:
 receiving a request for a particular object in an intelligent storage system comprising a plurality of storage devices and a control unit configured to determine a mapping for the request to one of the plurality of storage devices;
 evaluating characteristics of the particular object;
 creating a redirect link on one or more web servers from which the particular object may be requested if the evaluated characteristics of the particular object meet criteria, the redirect link being configured to redirect the request to the control unit of the intelligent storage system;
 creating an object serving link on the one or more of the web servers if the evaluated characteristics of the particular object do not meet the criteria;
 wherein the redirect link enables returning a direct status code to a requester of the object and wherein the contents of the redirect link are manually created; and

requesting establishment of a subsequent connection automatically in response to receiving the redirect status code for retrieving the particular object directly from the intelligent storage system;
wherein the intelligent storage system comprises network-attached storage.

Applicants submit that the cited references do not teach or suggest at least the above-underlined recitations.

In particular, Hu does not teach or suggest a redirect link that is configured to redirect the request to the control unit of the intelligent storage system as recited in Claim 101, where the intelligent storage system includes a plurality of storage devices and the control unit. In contrast, Hu proposes a redirect mode that returns to the requesting client whatever information is required to enable the client to establish a direct connection with the content server. (Hu, col. 3, lines 8-10.) Hu explains that the direct connection with the content server may result in significantly more efficient communication, (Hu, col. 12, lines 19-34). Therefore, Hu teaches away from a redirect link that is configured to redirect the request to an intermediate device, such as the control unit of the intelligent storage system as recited in Claim 101.

In addition, Hu does not teach or suggest a redirect link that enables returning a redirect status code to a requester of the object. Page 7 of the Action cites column 12, lines 43-52 of Hu as disclosing a redirect link that enables returning a redirect status code to a request of the object. However, the cited portion of Hu merely discusses that the redirect module **212** responds to the client **104** with whatever information is necessary according to the particular wide-area network protocol for the client **104** to contact the content server directly. Therefore, Hu proposes forwarding information so that the client **104** can contact the content server directly, but Hu fails to disclose a redirect link that includes a status code. As discussed in the Specification of the current application, a status code can include information about the redirect link, for example, whether the requested file was found, temporarily located at another address, permanently located at another address, etc. *See* Specification, page 16, line 15 – page 17, line 4.

Hu also does not teach or suggest that the contents of the redirect link are manually created. Page 9, lines 15-18 of the Action concedes that Hu does not disclose this feature, but states that "it would have been obvious to one having ordinary skill in the art at the time the invention was made to create the contents of the redirect link manually because it would have reduced all kinds of related costs (software development costs)." Applicants submit that the Action does not satisfy the requirements for an obviousness rejection under § 103, which requires that there be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Hu does not suggest reducing software development costs by manually creating the contents of a redirect link. In fact, Hu proposes a policy module 206 that assesses the current dynamic metric for a group of servers and selects one content server to service the client request. Hu, col. 12, lines 15-18. Therefore, Hu proposes dynamically creating a redirect link and teaches away from manually creating the contents of a redirect link as recited in Claim 101.

Additionally, Hu does not teach or suggest requesting the establishment of a subsequent connection automatically in response to receiving the redirect status code for retrieving the particular object directly from the intelligent storage system. Page 7, lines 17-20 of the Action states that this recitation is disclosed in column 12, lines 35-40 and column 18, lines 47-51 of Hu. However, as discussed above, Hu does not teach or suggest a redirect status code. Therefore, requesting the establishment of a subsequent connection automatically does not occur in response to receiving the redirect status code as recited in Claim 101.

Hu also does not teach or suggest that the intelligent storage system comprises network-attached storage. The Action concedes that Hu does not disclose that the intelligent storage system is network-attached storage, but states that network-attached storage is disclosed by Hubbard. The Action then concludes that it would have been obvious to incorporate the network-attached storage of Hubbard with Hu "for the purpose of obtaining [a] network-attached storage system" and that one of ordinary skill would have been motivated to do so "because

In re: Doyle et al.
Application No.: 09/943,562
Filed: August 30, 2001
Page 17

storage priority controls would have utilized (sic) to facilitate the full use of available storage resources, such as user specified constraints (Hubbard: see abstract)."

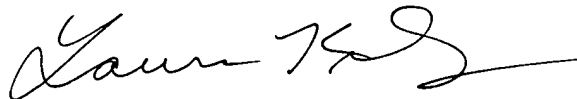
Applicants respectfully disagree. The abstract of Hubbard merely provides general advantages of a network-attached storage system. Neither reference provides any motivation to modify Hu by replacing the content servers of Hu with the network-attached storage system of Hubbard.

For at least these reasons, Applicants submit that Claim 101 is patentable over Hu and Hubbard.

CONCLUSION

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested.

Respectfully submitted,



Laura M. Kelley
Registration No. 48,441

USPTO Customer No. 46589
Myers Bigel Sibley & Sajovec
Post Office Box 37428
Raleigh, North Carolina 27627
Telephone: 919/854-1400
Facsimile: 919/854-1401